

September 15, 2000

Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Achievement Track Applications For Six Wood Preserving Facilities,
Kerr-McGee Chemical LLC, Forest Products Division

Dear Reviewer:

Kerr-McGee Chemical LLC, Forest Products Division is pleased to submit six individual applications for EPA's Achievement Track for our creosote wood preserving facilities. Each of these facilities has achieved ISO 9002 and 14001 certification by a third party registrar. Each of these facility subscribes to the American Chemical Council's Responsible Care Program®. All have achieved OSHA STAR status.

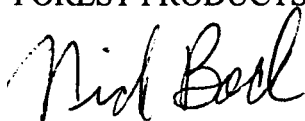
Pollution prevention activities instituted by these facilities are not new programs. This is demonstrated by the progress that each facility has made as outlined in the summary tab of the application. We have been pursuing pollution prevention for well over a decade and our results demonstrate our commitment.

Of special note is our progress in reducing the quantity of hazardous waste. Although we have not always demonstrated progress from year to year, the trend is definitely toward less hazardous waste generated per unit of production. We have re-dedicated ourselves to reduce the quantity of hazardous waste generated by 75% in the next three years.

Should you or any member of the review team have any questions, please telephone me at (405) 270- 2394 or email me at nbock@kmg.com.

Sincerely,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION



Nick Bock
Manager, Regulatory Compliance and Environmental Affairs

All FPD Plants
J. L. Sanders

National Environmental Achievement Track Application
Pollution Prevention History
Kerr-McGee Chemical, Forest Products Division

VOC's Used In Performance Track Application						
From Form R - Point Source VOC (Pounds Per 1000 CUFT Production)						
Reporting Year	Total Point Sources (Creosote Releases lbs/yr.) Reported					
	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	4.76	6.60	3.86	2.25	4.52	5.54
1995	4.83	7.07	4.18	2.18	3.80	3.88
1996	1.46	3.45	4.06	1.78	3.11	0.89
1997	1.11	2.48	3.87	1.24	2.47	0.90
1998	0.94	1.82	1.76	1.76	1.95	1.21
1999	0.90	1.66	1.40	0.67	1.28	0.72
2002 Target	0.76	1.41	1.19	0.57	0.64	0.61

Hazardous Waste Used In Performance Track Application						
Without Remediation Waste (Pounds HW/ Thousand Cuft Prod.)						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	19	120	117	19	89	62
1995	211	91	80	22	20	119
1996	24	161	95	7	23	67
1997	46	13	178	16	13	18
1998	12	201	55	7	27	96
1999	33	7	10	8	15	16
2002 Target	8	2	2	2	4	4

Wastewater Used In Performance Track Application						
Wastewater (Pounds O&G/Thousand Cuft) From Form R						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	0.33	0.41	0.29	0.53	0.15	0.09
1995	0.25	0.19	0.50	0.47	0.08	0.07
1996	0.48	0.39	1.80	0.61	0.04	0.00
1997	0.21	0.64	0.84	0.84	0.03	0.02
1998	0.21	0.83	0.63	1.05	0.02	0.01
1999	0.25	0.72	0.32	0.95	0.02	0.01
2002 Target	0.21	0.61	0.27	0.80	0.02	0.01

Retort Doors Used In Performance Track Application						
Retort Doors (Pounds-HAP/thousand Cuft production)						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	0.35	0.29	0.30	0.33	0.20	0.35
1995	0.35	0.29	0.30	0.33	0.20	0.35
1996	0.34	0.38	0.23	0.25	0.14	0.25
1997	0.25	0.21	0.30	0.23	0.14	0.25
1998	0.23	0.18	0.29	0.23	0.05	0.25
1999	0.24	0.19	0.20	0.20	0.09	0.20
2002 Target	0.20	0.16	0.17	0.17	0.08	0.17



National Environmental Achievement Track

Application Form

Kerr-McGee Chemical LLC, Madison, Illinois

Name of facility

Kerr-McGee Corporation

Name of parent company (if any)

#2 Washington Avenue

Street address

Street address (continued)

Madison, Illinois 62060

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Nick Bock

Title Mgr. Env. Affairs & Reg. Compliance

Phone 405/270-2394

Fax 405/270-2420

E-mail nbock@kmg.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Creosote preserved wood for railroads; cross ties
switch ties, crossings, bridges, utility poles & piling

2 List the Standard Industrial Classification (SIC)
code(s) or North American Industrial Classification
System (NAICS) codes that you use to classify
business at your facility.

SIC
2491

NAICS

3 Does your company meet the Small Business
Administration definition of a small business for your
sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents)
currently work at your facility?

X Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

ILD020367561

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See Attached Checklist

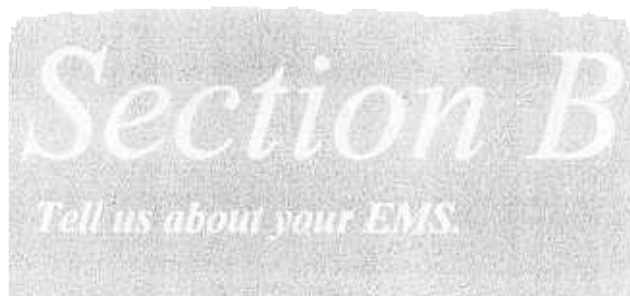
7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

ISO 9002 Certified Facility
ISO 14001 Certified Facility
OSHA STAR Certified Facility
ACC Responsible Care Program®
Application to IEPA Pollution Prevention Program



Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Combined ISO 9002/14001 Mgmt System

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of VOCs	1.76	lbs VOC/1000 FT3 Production	1.40	lbs VOC/1000 FT3 Production
<p>i. How is the current level an improvement over the previous level?</p> <p>Decrease in emissions per production unit.</p> <p>See performance since 1994 in "Summary Tab"</p> <p>ii. How did you achieve this improvement?</p> <p>Vessel Closure</p> <p>Vapor Balancing</p> <p>Control Device 1997/1998 - Modified Control Device 1999</p>				



Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazard Solid Waste	55	lbs HW/1000 FT3 Production	10	lbs HW/1000 FT3 Production
How is the current level an improvement over the previous level?				
Reduced quantity of production waste				
See performance since 1994 in "Summary Tab"				
ii. How did you achieve this improvement?				
Reduced spills/				
Source separation				
Recycle/employee training				
Employee Quality Action Teams				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Emissions of VOCs (Point Sources)

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

1.40 lbs VOCs/1000 FT3
Production
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

1.19 lbs VOCs/1000 FT³
Production
(Quantity/Units)

e. How will you achieve this improvement?

Maximize Control Device Performance

Evaluate additional control technology

Reduced Door Cycle Time

See performance since 1994 in "Summary Tab"

Second aspect you've selected

a. What is the aspect?

Production Hazard Solid Waste Reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

10 lbs HW/1000 FT³
Production
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

2 lbs HW/1000 FT³
Production
(Quantity/Units)

e. How will you achieve this improvement?

Eliminate Spills/Promote Source Separation

Promote recycling

Reduce Storage Yard Drillage

Employee Training

Employee Quality Action Teams

See performance since 1994 in "Summary Tab"

Third aspect you've selected

- a. What is the aspect? Discharges of Toxics to Water
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 0.32 lbs O&G/1000 FT3 Production (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 0.27 lbs O&G/1000 FT3 Production (Quantity/Units)
- e. How will you achieve this improvement? Optimize wastewater treatment system
Promote Source Separation
Employee Training
Employee Quality Action Teams
- See performance since 1994 in "Summary Tab"
-

Fourth aspect you've selected

- a. What is the aspect? Emissions of Toxics from Doors (HAPs)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 0.20 lbs HAP/1000 FT3 Production (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 0.17 lbs HAP/1000 FT3 Production (Quantity/Units)
- e. How will you achieve this improvement? Reduce Door cycle Time
Evaluate Creosote Formulation
Employee Training
Employee Quality Action Teams
- See performance since 1994 in "Summary Tab"

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

One Open House Per Year

Attend LEPC Meetings

Respond to neighbor complaints

Meet neighbors

Discuss with local regulators

2 How do you inform community members of important matters that affect them?

One Open House Per Year

Attend LEPC Meetings

Respond to neighbor complaints

Meet neighbors

Seek news coverage while performing community service

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website [www.](#)

☒ Newspaper

☒ Open Houses

☒ Other

Trade Association

LEPC Presentation

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/Citizen Group</i>	Fire Chief Madison, IL	Mike Foley	618-876-6268
<i>Trade Association</i>	American Wood Preservers Institute	Scott R. Ramminger	703-204-0500
<i>State/Local Regulator</i>	Illinois Environmental Protection Agency	Chris Cahnovsky	618-346-5120
<i>Other community/local reference</i>	Tri-Cities Area Chamber of Commerce	R. C. Bush, Executive Vice President	618-876-6400

Section E

Application and Participation Statement.

On behalf of Kerr-McGee Chemical LLC, Madison, IL
[my facility],

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Nick Bock 9/12/00

Printed Name/Title Nick Bock/Mgr. Env. Affairs & Reg. Compliance

Facility Name Kerr-McGee Chemical LLC, Madison, IL

Facility Street Address #2 Washington Avenue, Madison, IL 62060

Facility ID Numbers ILD020367561

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Kerr-McGee Chemical LLC, Madison, IL
Facility Location: # 2 Washington Avenue
Facility ID Number(s): ILD02036761
(attach additional sheets if necessary)

Air Pollution Regulations

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All
That Apply

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
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<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
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<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

4.

<input type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3 Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☒
 - Preparedness and prevention ☒
 - Contingency plan and emergency procedures ☒
 - Manifest system, Record keeping and reporting ☒
 - Groundwater protection ☒
 - Financial requirements ☒
 - Use and management of containers ☒
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☒
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7 Administered Permit Program (Part B) (40 CFR 270) ☒

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

- | | |
|---|--------------------------|
| 4. Solid Waste Storage and Removal Requirements | <input type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- | | |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

Water Pollution Control Requirements

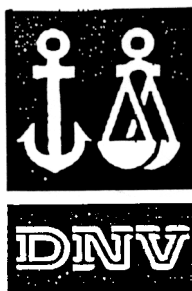
- | | |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116) | <input checked="" type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122) | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129) | <input checked="" type="checkbox"/> |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | <input checked="" type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | <input type="checkbox"/> |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | <input type="checkbox"/> |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | <input type="checkbox"/> |
| 10. Water Quality Standards | <input checked="" type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers | <input checked="" type="checkbox"/> |
| 12. Permit Monitoring/Reporting Requirements | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge | <input type="checkbox"/> |
| 15. Oil Discharge Containment, Control and Cleanup | <input checked="" type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment) | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 17. | <input type="checkbox"/> |
| 18. | <input type="checkbox"/> |

Drinking Water Regulations

- | | |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141) | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | <input type="checkbox"/> |
| 5. Underground Injection Control Requirements | <input type="checkbox"/> |



DNV Certification, Inc.

DET NORSKE VERITAS

ENVIRONMENTAL MANAGEMENT SYSTEM CERTIFICATE

Certificate No. CERT-02108-98-AE-HOU-RAB

This is to certify that the Environmental Management System
of

KERR-MCGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

at

#2 Washington Avenue, Madison, IL 62060 USA

Has been found to conform to Environmental Management System Standard:

ISO 14001, 1996

This Certificate is valid for the following scope:

**THE ENVIRONMENTAL MANAGEMENT SYSTEM OF KERR-MCGEE CHEMICAL
LLC FOREST PRODUCTS DIVISION IN MADISON, IL ASSOCIATED WITH THE
MANUFACTURE OF TREATED RAILROAD CROSSTIES AND SWITCHTIES**

Place and date:

Houston, Texas; 16 November 1998

This certificate is valid until:

30 September 2001

Initial Certification Date:

30 September 1998

for the Accredited Unit:
DET NORSKE VERITAS CERTIFICATION, INC.
Houston, TX USA



Rudy Frueboes
Rudy Frueboes
Management Representative
DNV Certification, Inc.

Norman Kinsey
Norman Kinsey
Lead Auditor

Lack of fulfillment of conditions as set out in the Appendix may render this certificate invalid.



DNV Certification, Inc.

DET NORSKE VERITAS QUALITY SYSTEM CERTIFICATE

Certificate No. 98-HOU-AQ-1032

This is to certify that the Quality System
of

**KERR-MCGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION
WOOD PRESERVING FACILITY**

at

#2 Washington Avenue, Madison, IL 62060 USA

Has been found to conform to Quality Standard:

ISO 9002, 1994

This Certificate is valid for the following products/service ranges:

THE MANUFACTURE OF TREATED RAILROAD CROSS-TIES

Place and date:

Houston, Texas; 04 December 1998

This certificate is valid until:

29 September 2001

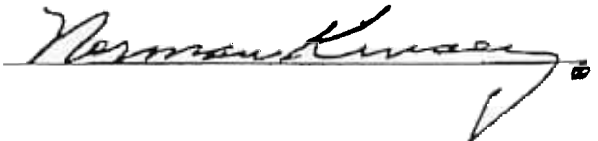
for the Accredited Unit:
DET NORSKE VERITAS CERTIFICATION, INC.
Houston, TX USA



Initial Certification Date:

08 September 1995


Rudy Frueboes
Management Representative
DNV Certification, Inc.



Lack of fulfillment of conditions as set out in the Appendix may render this certificate invalid

The United States Department of Labor



Occupational Safety and Health Administration

Kerr-McGee Chemical Corporation *This is to certify that*

Forest Products Division

Company Name

located at

Madison, Illinois

Location of Worksite

meets the requirements for the Voluntary Protection Program

STAR

and participation is hereby approved on January 18, 1995

Date

Joseph A. Dear

Assistant Secretary of Labor